

AB:NCG

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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2024 3 19

UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. §§ 1704, 1708)

JIN LI, also known as YUN-JUN LI,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

STEVEN HE, being duly sworn, deposes and states that he is a Postal Inspector with the United States Postal Inspection Service, duly appointed according to law and acting as such.

On or about March 16, 2022, within the Eastern District of New York and elsewhere, the defendant JIN LI, also known as YUN-JUN LI did knowingly and unlawfully possess a counterfeit key suited to any lock adopted by the Postal Service for any authorized receptacle for the deposit or delivery of mail matter with the unlawful and improper intent to use the same.

(Title 18, United States Code, Section 1704)

On or about March 16, 2022, within the Eastern District of New York and elsewhere, the defendant JIN LI, also known as YUN-JUN LI did unlawfully have in her possession, any letter, postal card, package, bag, or mail, or any article or thing contained therein, which had been so stolen, taken, embezzled, or abstracted from or out of any mail, post office, station, letter box, mail receptacle, mail route or otherwise authorized depository, knowing the same to have been stolen, taken, embezzled, or abstracted.

(Title 18, United States Code, Section 1708)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Postal Inspector with the United States Postal Inspection Service ("USPIS") and have been involved in the investigation of numerous cases involving postal theft. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. Since on or about February 26, 2022, the USPIS has determined that at least one individual has stolen multiple relay bags from United States Postal Service ("USPS") relay boxes in Queens, New York. Each of these incidents involved the unauthorized use of a counterfeit "arrow" key to gain access to the relay boxes. An arrow key is a universal key that the USPS uses to access certain relay boxes.

3. On or about February 26, 2022, the USPS determined that mail was stolen from a relay box located near 159th Street and Sanford Avenue in Flushing, New York.

4. On or about March 1, 2022, I conducted surveillance around 159th Street and Sanford Avenue in Flushing, New York, to investigate the February 26, 2022, incident. At or around 11:55 a.m., I observed an individual later identified as LI walking to a relay box located near 159th Street and Sanford Avenue. I observed LI use an arrow key to open the relay box, remove its contents, and place the contents inside a laundry bag she was carrying. I then observed LI walk to an apartment building located at 144-44 Sanford Avenue, Flushing, New

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

York 11358. I took video footage of the incident. The following still image from the video footage identifies LI with the laundry bag full of contents from the relay box:



5. On or about March 3, 2022, I spoke to an employee at the apartment building located at 144-44 Sanford Avenue, Flushing, New York 11358. I showed the employee video footage of the individual returning to the apartment building from March 1, 2022, and he identified the individual as LI.

6. On or about March 11, 2022, I conducted physical surveillance around 159th Street and Sanford Avenue, Flushing, New York, when I observed an individual resembling LI. At or around 12:10 p.m., I observed LI steal mail from a residential mailbox located at or around 163-07 Sanford Avenue. I observed LI sorting through the stolen mail

before disposing of the mail in the trash outside of a Dunkin' Donuts nearby, located at or around 166th Street and Northern Boulevard. I observed LI continue walking until she accessed a relay box at 160th Street and Northern Boulevard. I observed her pull out what I believed to be an arrow key or counterfeit arrow key. She opened the relay box, looked inside, and then closed the box. She placed the key back into her pocket and continued walking. I subsequently observed her access another relay box located around 159th Street and 35th Avenue. Around approximately 12:54 p.m., she accessed the relay box, which contained a bag of mail inside. She then placed the entire relay box bag into her own gray or white laundry bag.

7. On or about March 16, 2022, I observed LI stealing mail directly from a mail carrier pushcart at or around 160th Street and Oak Avenue in Flushing, New York. She subsequently stole mail from various residential mailboxes and discarded mail as she walked. I then observed her access a relay box on or around 46th Avenue and Utopia Parkway in Flushing, and she placed the mail into a white laundry bag. She went through the mail and discarded it into trash cans and a sewer as she walked. Next, I observed her access a relay box at or around Northern Boulevard and Auburndale Lane in Flushing, New York. She took the relay bag out of the relay box and placed it into the white laundry bag she was carrying. She is pictured below:

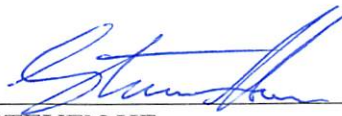


8. LI subsequently took a car service back to her apartment building and was placed under arrest. At the time of arrest, LI was carrying a laundry bag full of stolen mail, pictured below:



9. Following her arrest, LI was provided with her Miranda warnings, agreed to waive them and speak to the officers. LI provided written and verbal consent for officers to search her apartment. The officers subsequently entered her apartment, where they located and weighed substances that appear to be 2.2 ounces of methamphetamine. LI admitted to officers that she had methamphetamine in her apartment.

WHEREFORE, your deponent respectfully requests that the defendant JIN LI, also known as YUN-JUN LI, be dealt with according to law.

  
STEVEN HE  
Postal Inspector, United States Postal Inspection  
Service

Sworn to before me this  
17<sup>th</sup> day of March, 2022

THE HON  
UNITED  
EASTERN DISTRICT OF NEW YORK